

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

NATIONAL INDOOR FOOTBALL LEAGUE L.L.C.,	:	CIVIL DIVISION
Plaintiff	:	NO. CA 2 - 548
v.	:	TYPE OF PLEADING:
	:	Designation of Depositions, Interrogatory
R.P.C. EMPLOYER SERVICES, INC.,	:	Answers and Responses to Admissions for
and DAN J. D'ALIO,	:	Use at Trial
Defendants.	:	

DESIGNATION OF DISCOVERY FOR USE AT TRIAL

AND NOW, comes the Plaintiff, NATIONAL INDOOR FOOTBALL LEAGUE, L.L.C., by and through its attorneys, Leventry, Haschak, & Rodkey, LLC, and files the foregoing Designation of Depositions, Interrogatory Answers and Responses to Admissions for Use at Trial and in support thereof states as follows:

DEPOSITION DESIGNATION

At trial, the Plaintiff intends to use at witnesses Carolyn Shiver, Marty Herf, Rex Blateri and Dan D'Alio, accordingly, their deposition testimony will not be offered at trial except for impeachment or rebuttal purposes.

RESPONSES TO ADMISSIONS DESIGNATION

At trial, the Plaintiff intends to call and/or cross-exam Dan A'lio as a witness, therefore, RPC Employer Services, Inc.'s and Dan D'Alio's Responses to Admissions will not be introduced at trial except for impeachment or rebuttal purposes.

ANSWERS TO INTERROGATORIES DESIGNATION

At trial, the Plaintiff intends to call and/or cross-exam Dan A'Alio as a witness, therefore, RPC Employer Services, Inc.'s and Dan D'Alio's Answers to Interrogatories will not be introduced at trial except for impeachment or rebuttal purposes.

Respectfully submitted,

Date: 3-13-06

s/Timothy C. Leventry

Timothy C. Leventry, L.L.M.
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CERTIFICATION

I, Timothy C. Leventry, do hereby certify that a true and correct copy of the foregoing National Indoor Football League's Designation of Depositions, Interrogatory Answers and Responses to Admissions for Use at Trial was served on the individuals listed below by **Regular 1st Class U.S. Mail:**

Michael J. Seymour, Esq.
FECZKO AND SEYMOUR
520 Grant Building
310 Grant Street
Pittsburgh, PA 15219

Bernard C. Caputo, Esq.
Fort Pitt Commons Building, Suite 260
445 Fort Pitt Boulevard
Pittsburgh, Pennsylvania 15219

The Honorable Terrence F. McVerry
U.S. Post Office & Courthouse
Seventh Avenue & Grant St.
10th Floor, Room 1008
Pittsburgh, PA 15219

**LEVENTRY, HASCHAK,
RODKEY & KLEMENTIK, LLC**

Dated: 3-13-06

By: s/Timothy C. Leventry
Timothy C. Leventry, LL.M

